

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,

Plaintiffs,

v.

CITY OF ST. LOUIS,

Defendant.

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Case No. 4:17-CV-2455 CDP

**MOTION FOR PROTECTIVE ORDER PRECLUDING DEPOSITIONS OF
WILLIAM OLSTEN AND JEREMY DAVIS**

Pursuant to F.R.Civ.P. 26(c)(1), defendant respectfully moves the Court to enter its order precluding the noticed depositions of William Olsten and Jeremy Davis.

Defendant files a memorandum in support of this motion concurrently herewith.

Pursuant to Rule 26(c)(1) and Local Rule 37-3.04(A), undersigned counsel states that he has conferred in person and via e-mail with counsel for plaintiffs, Anthony Rothert, in good faith on March 6 and 7, 2019, at various times (including in person at approximately 3 p.m. on March 7) in a good faith effort to resolve the dispute, but counsel have been unable to reach agreement as to deponents Olsten and Davis.

WHEREFORE, defendant prays that the Court order that the depositions of Messrs. Olsten and Davis not take place unless and until they are first deposed in damage suits now pending against them arising out of events that are the subject of plaintiffs' claims herein, or until they are dismissed from such actions if that occurs prior to the discovery deadline herein.

Respectfully submitted,

JULIAN L. BUSH

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